

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
	)	<b>CASE NO.: 2:19-cr-00010</b>
<b>v.</b>	)	<b>JUDGE WILLIAM L. CAMPBELL</b>
	)	
<b>GILBERT GHEARING</b>		

**UNOPPOSED DEFENDANT’S MOTION TO MODIFY CONDITIONS OF RELEASE**

Comes now Defendant Gilbert Ghearing, by and through his counsel Meggan Bess Sullivan and Ronald W. Chapman, II, and hereby requests this Court enter an order modifying the conditions of release, to allow Defendant to travel within the state of Tennessee for work and to visit family without restriction or permission from US Probation. In support thereof, Defendant states as follows:

1. The Order Setting Conditions of Release [Doc. 17] was entered on May 22, 2019.
2. Defendant secured bail and is currently being supervised by the U.S. Pretrial Services Office.
3. Defendant is fully compliant with the conditions of release.
4. Defendant now seeks a modification of this Court’s order, specifically Condition Numbers 7(f) to allow Defendant to travel across district lines within the state of Tennessee for employment and to visit family.
5. Defendant is confined to the Middle District of Tennessee.
6. Pretrial Services who has no objection.
7. The Government requests an additional modification be added as follows at special condition (u): the Defendant shall have no contact with patients named in the counts of the indictment, except

through his counsel or an agent of his counsel while on pretrial release. Defendant does not object to this modification.

7. The Government by Assistant U.S. Attorney Sarah Bogni, does not object.

WHEREFORE, for the foregoing reasons Defendant requests this Court enter an order modifying his conditions of release to allow him to travel within the state of Tennessee for work and to visit family, and modifying his special conditions regarding contact with patients as outlined above.

DATE: November 21, 2022

RESPECTFULLY SUBMITTED,

*/s/ Meggan B. Sullivan*  
Meggan B. Sullivan  
Tennessee Bar No. 33067  
Counsel for Defendant Ghearing  
424 Church Street  
Suite 2000  
Nashville, TN 37209  
T: (615) 457-0449  
msullivan@chapmanlawgroup.com

*/s/ Ronald W. Chapman*  
Ronald W. Chapman II, Esq., LL.M.  
Michigan Bar No. P73179  
Counsel for Defendant Ghearing  
1441 West Long Lake Road, Ste 310  
Troy, MI 48098  
T:(248)644-6326  
RWChapman@ChapmanLawGroup.  
com

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Motion to Modify Conditions of Pretrial Release was served via email the Court's CM/ECF system on Assistant United States Attorneys, Sarah Bogni and Juliet Aldridge on November 21, 2022.

*/s/ Megan B. Sullivan*